

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION

FILED BY ule D.C.  
05 JUL 27 AM 10:25

THOMAS M. GOULD  
CLERK, U.S. DISTRICT COURT  
W.D. OF TN, MEMPHIS

UNITED STATES OF AMERICA,

Plaintiff,

vs.

TRINA THOMAS,

Defendant.

Cr. No. 04-20506-M

MOTION GRANTED

Matter is RESET  
for Report on August  
26, 2005 at 9:00 AM.  
Time is Excluded.

JON PHIPPS McALLA  
U.S. DISTRICT JUDGE

Jul 26, 2005  
DATE

**MOTION TO CONTINUE TRIAL**

Comes now the United States by and through its counsel, Terrell L. Harris, United States Attorney for the Western District of Tennessee and moves the Court to continue the trial of Trina Thomas currently scheduled for August 8, 2005.

In support of said motion, the United States submits that the government's cooperating witness is in Federal Custody. The United States Marshals have informed government counsel that this witness is being housed out of state and is deemed to be experiencing a high risk pregnancy. It has been further represented that Bureau of Prisons' medical staff will not clear her for travel to the Western District of Tennessee. The government will not be requesting a long continuance as it has been represented by the United States Marshals that this individual's due date is in September. Pursuant to local rules, counsel for the defendant has been contacted and indicates he will oppose the motion.

Respectfully submitted,

TERRELL L. HARRIS  
United States Attorney

By: *Rae Oliver*  
V. RAE OLIVER  
Assistant United States Attorney  
167 N. Main, Room 800  
Memphis, TN 38103  
(#18831 Tennessee)

**CERTIFICATE OF SERVICE**

I, V. Rae Oliver, Assistant United States Attorney for the Western District of Tennessee, hereby certify that a copy of the foregoing Motion to Continue Trial has been mailed, first class postage pre-paid, to K. Jayaraman, 147 Jefferson Avenue, Memphis, Tennessee 38103, Facsimile (901) 522-8243.

This 26<sup>th</sup> day of July, 2005.

*Rae Oliver*  
V. RAE OLIVER  
Assistant United States Attorney  
167 N. Main, Room 800  
Memphis, TN 38103



## Notice of Distribution

This notice confirms a copy of the document docketed as number 29 in case 2:04-CR-20506 was distributed by fax, mail, or direct printing on July 29, 2005 to the parties listed.

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LAW OFFICES OF K. JAYARAMAN  
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Honorable Jon McCalla  
US DISTRICT COURT